

1 **Robert Tenorio Torres**
2 **Attorney at Law**
3 Plata Dr., Whispering Palms
4 Chalan Kiya
5 P.O. Box 503758
6 Saipan, MP 96950
7
8 Tel: (670) 234-7859
9 Fax: (670) 234-5749
10
11 Attorney for Defendant

12
13
14
15
16
17
18
19
20
21
22
23

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

UNITED STATES OF AMERICA,

Criminal Case No. 07-00010

Plaintiff,

**STIPULATION TO EXTEND
DEADLINE FOR PRETRIAL
MOTIONS**

vs.

QIU, ZHI YUN

Defendant.

COME NOW, Plaintiff United States of America, through Assistant U.S. Attorney
Craig N. Moore, and Defendant Qiu, through Counsel Robert T. Torres, and hereby
stipulate to extend the deadline for pretrial motions.

Trial in this case was scheduled to begin on July 2, 2007. However, on June 26,
2007, the parties appeared before this Court for a hearing, where the Defendant waived
his right to a speedy trial. The Court rescheduled the jury trial to commence on
September 17, 2007 at 9:00 a.m.

In light of this, Counsel agree that the deadline for pretrial motions, which was on
June 14, 2007, should also be extended because of the later trial date. Counsel

Robert Tenorio Torres
Attorney at Law
1st Floor ~ D/Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859

1 respectfully suggest a new deadline of August 20, 2007 to file pretrial motions.
2

3 SO STIPULATED this 27th day of June, 2007.
4

5 /s/ Craig N. Moore

6 CRAIG N. MOORE
Assistant U.S. Attorney

/s/ Robert T. Torres

ROBERT T. TORRES
Attorney for Defendant

Robert Tenorio Torres
Attorney at Law
1st Floor ~ D/Torres Building ~ Garapan
P.O. Box 503758 ~ Saipan MP 96950 ~ (670) 233-7859